

UNITED STATES DISTRICT COURT

WESTERN

DISTRICT OF

OKLAHOMA

RUSS and NATALIE GODFREY

JOINT
EXHIBIT AND WITNESS LIST

V.

CSAA FIRE & CASUALTY INS. CO.

Case Number: 5:19-cv-329-JD

PRESIDING JUDGE Judge Jodi W. Dishman					PLAINTIFF'S ATTORNEY Mark Engel/Keith Givens	DEFENDANT'S ATTORNEY Gerard Pignato
TRIAL DATE (S) 03/09/2020					COURT REPORTER	COURTROOM DEPUTY Nyssa
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
1					Certified copy of insurance policy issued to Plaintiffs, including declarations pages and	
					all endorsements. (CSAA_GODFREY 00001-00004, 00567-00780)	
2					CSAA claim notes. (CSAA_GODFREY 00536-00566)	
3					Letter from Sayde Brooks (CSAA) to Russ Godfrey. (CSAA_GODFREY 00005-00012)	
4					US Adjusting "sketches" of Godfrey roof. (CSAA_GODFREY 00034-00036)	
5					Photos taken by Michael White during inspection. (CSAA_GODFREY 00053-00115)	
6					Michael White (US Adjusting Services) Estimate (inspected on 02/28/18).	
					(CSAA_GODFREY 00037-00042, 00118-00128)	
7					Michael White (US Adjusting Services) Estimate-Components (inspected on 02/28/18).	
					(CSAA_GODFREY 00129-00132)	
8					Price Variation Usage Report-US Adjusting Services, Statement of Loss-US Adjusting Services,	
					US Adjusting Services invoice (\$412). (CSAA_GODFREY 00133-00135)	
9					Loss Report-US Adjusting Services dated 03/02/18. (CSAA_GODFREY 00199-00200)	
10					Michael White (US Adjusting Services) Estimate (inspected on 02/28/18).	
					(CSAA_GODFREY 00231-00241)	
11					Loss Report-US Adjusting Services dated 03/03/18. (CSAA_GODFREY 00311-00312)	
12					Statement of Loss-US Adjusting Services. (CSAA_GODFREY 00313-00322, 00386-00387)	
13					Mark Costello estimate for CSAA, Price Variation Usage Report-CSAA, Mark Costello	
					sketches for estimate. (CSAA_GODFREY 00451-00466)	
14					Mark Costello Estimate Audit Trail and Mark Costello Estimate-Components.	
					(CSAA_GODFREY 00467-00476, 00477-00486)	
15					Letter from Sayde Brooks (CSAA) to Russ Godfrey. (CSAA_GODFREY 00489-00490)	

* Include a notation as to the location of any exhibit not held with the case file or not available because of size.

UNITED STATES DISTRICT COURT

WESTERN

DISTRICT OF

OKLAHOMA

RUSS AND NATALIE GODFREY

JOINT
EXHIBIT AND WITNESS LIST

V.

CSAA FIRE & CASUALTY INS. CO.

Case Number: 5:19-cv-329-JD

PRESIDING JUDGE Judge Jodi W. Dishman					PLAINTIFF'S ATTORNEY Mark Engel/Keith Givens	DEFENDANT'S ATTORNEY Gerard Pignato
TRIAL DATE (S) 3/9/2020					COURT REPORTER	COURTROOM DEPUTY Nyssa
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
16					Letter from Sayde Brooks (CSAA) to Russ Godfrey. (CSAA_GODFREY 00491-00502)	
17					Email from Allen Lippoldt (Ultimate Roofing) to Sayde Brooks (CSAA).	
					(CSAA_GODFREY 00508)	
18					Email from Allen Lippoldt (Ultimate Roofing) to Sayde Brooks (CSAA) and photos.	
					(CSAA_GODFREY 00509-00522)	
19					Email from Sayde Brooks (CSAA) to Allen Lippoldt (Ultimate Roofing).	
					(CSAA_GODFREY 00523-00524)	
1					Russ Godfrey (Deposed)-Ps: Purchase of insurance; ice damage to roof, interior leaks, cost of	
					repair, denial of claim, unreasonableness of denial and underpayment, representations of	
					Defendant's adjusters. D: All relevant issues, insurance policies issued on subject property,	
					investigation and handling of subject claims, prior claims and lawsuits.	
2					Natalie Godfrey (Deposed)-Ps: Purchase of insurance, ice damage to roof, interior leaks, cost of	
					repair, denial of claim, unreasonableness of denial and underpayment, representations of	
					Defendant's adjuster. D: All relevant issues, insurance policies issued on subject property,	
					investigation and handling of subject claims.	
3					Sayde Brooks (Deposed)-Ps: Inspections and estimates performed at Defendant's request;	
					guidelines, rules and restrictions applicable to work performed at Defendant's request; revenue	
					sought or received from work performed at Defendant's request; nature, cause and extent of	
					damages sustained by Plaintiffs' home; inspections and estimates related to Plaintiffs' home;	
					contacts with Defendant and/or individuals associated with Defendant; issues raised by Defendant.	

* Include a notation as to the location of any exhibit not held with the case file or not available because of size.

UNITED STATES DISTRICT COURT

WESTERN

DISTRICT OF

OKLAHOMA

RUSS AND NATALIE GODFREY

JOINT
EXHIBIT AND WITNESS LIST

V.

CSAA FIRE & CASUALTY INS. CO.

Case Number: 5:19-cv-329-JD

PRESIDING JUDGE Judge Jodi W. Dishman					PLAINTIFF'S ATTORNEY Mark Engel/Keith Givens	DEFENDANT'S ATTORNEY Gerard Pignato
TRIAL DATE (S) 3/9/2020					COURT REPORTER	COURTROOM DEPUTY Nyssa
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
					D: Investigation and handling of Plaintiffs' claim.	
4					Mark Costello (Deposed)-Ps: Inspections and estimates performed at Defendant's request;	
					guidelines, rules and restrictions applicable to work performed at Defendant's request;	
					revenue sought or received from work performed at Defendant's request; nature, cause and	
					extent of damages sustained by Plaintiffs' home; inspections and estimates related to Plaintiffs'	
					home; contacts with Defendant and/or individuals associated with Defendant; issues raised by	
					Defendant. D: Investigation and handling of Plaintiffs' claim.	
5					Alana Hare (Deposed)-Ps: Inspections and estimates performed at Defendant's request;	
					guidelines, rules and restrictions applicable to work performed at Defendant's request;	
					revenue sought or received from work performed at Defendant's request; nature, cause and	
					extent of damages sustained by Plaintiffs' home; inspections and estimates related to Plaintiffs'	
					home; contacts with Defendant and/or individuals associated with Defendant; issues raised by	
					Defendant. D: Investigation and handling of Plaintiffs' claim; CSAA's claim handling policies	
					and procedures.	
6					Michael White-Ps: Inspections and estimates performed at Defendant's request; guidelines,	
					rules and restrictions applicable to work performed at Defendant's request; revenue sought	
					or received from work performed at Defendant's request; nature, cause and extent of damages	
					sustained by Plaintiffs' home; inspections and estimates related to Plaintiffs' home; contacts with	
					Defendant and/or individuals associated with Defendant; issues raised by Defendant.	
					D: Inspections and estimates performed; method of compensation; discussion of what an	
					independent adjuster does.	

* Include a notation as to the location of any exhibit not held with the case file or not available because of size.